Senate
Impeachment Court
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Atty. RENATO N. BANTUG JR.
Clerk of the Impeachment Court

REPUBLIC OF THE PHILIPPINES
SENATE
IMPEACHMENT COURT

IN THE MATTER OF:

IMPEACHMENT TRIAL OF
VICE PRESIDENT
SARA ZIMMERMAN DUTERTE

CASE NO. 004-2026

PRE-TRIAL BRIEF

(For the Prosecution)

The Honorable Public Prosecutors respectfully state:

MATTERS COMMON TO ALL ARTICLES OF IMPEACHMENT

I.
PROPOSED STIPULATIONS

1.1. Respondent Vice President Sara Z. Duterte is the same person referred to as the respondent in the Articles of Impeachment.

1.2. Respondent formally assumed office as the Vice President of the Republic of the Philippines on June 30, 2022.

1.3. Upon her assumption as Vice President, respondent was concurrently appointed Secretary of the Department of Education. Respondent held such office until July 19, 2024.

1.4. The Committee on Justice ("COJ") conducted hearings on March 2, 3, 4, 18, 25, April 14, 22, and 29, 2026, in relation to the impeachment complaints filed against respondent.

1.5. The authenticity of the transcripts of stenographic notes ("TSNs") and video recordings of the hearings conducted by the COJ during its hearings held on March 2, 3, 4, 18, and 25, 2026, as well as on April 14, 22, and 29, 2026.

1.6. The House of Representatives Legislative Library, Archives and Museum is the repository of all legislative records, including records of committee hearings, such as proceedings before the COJ and CGGPA.

1.7. The authenticity of the documentary submissions of the COJ to the House of Representatives Legislative Library, Archives and Museum.

II.
SUMMARY OF ADMITTED FACTS

2.1. The Prosecution admits only those allegations contained in the Articles of Impeachment, in the Saballa, *et al.* and Cabrera Impeachment Complaints, and other pleadings, papers, and documents the Prosecution submitted to the Impeachment Court in the course of the instant proceedings.

III.
PROPOSED TRIAL DATES AND HEARING SCHEDULE

3.1. The Prosecution is prepared to proceed with trial on such dates and under such schedule as may be fixed by the Impeachment Court.

3.2. At this stage, the total number of hearing dates required for the presentation of evidence cannot be determined independently of the trial parameters to be established by the Impeachment Court, including the number of witnesses to be heard per hearing date and the time allotted for each hearing.

3.3. Accordingly, the Prosecution respectfully submits that the hearing schedule, including the frequency of trial dates, the duration of hearings, and the projected timetable for the presentation of evidence, may be discussed and finalized during the Pre-Trial Conference.

IV.
ORDER OF PRESENTATION OF WITNESSES

4.1. The Prosecution does not intend to present its evidence strictly in the numerical sequence of Articles I, II, III, and IV of the

Articles of Impeachment. Instead, the Prosecution anticipates presenting evidence in a different sequence designed to facilitate a more orderly, logical, and efficient presentation of its case.

4.2. The anticipated sequence of presentation may take into account, among other considerations, the relationship of the evidence to multiple Articles of Impeachment, the avoidance of repetitive testimony, and the efficient organization of testimonial and documentary evidence. However, the sequence of presentation shall not be construed as reflecting the relative importance of any particular Article, all of which the Prosecution intends to prove through competent evidence.

4.3. The specific order of the presentation of evidence may be discussed during the Pre-Trial Conference, and the parties may, if practicable, agree upon a presentation schedule, subject to such modifications as may be required by the interests of justice and the orderly conduct of the proceedings.

ARTICLE I:
MISUSE AND MISAPPROPRIATION OF CONFIDENTIAL FUNDS

I.
THE PROSECUTION'S CLAIMS

1.1. Respondent Vice President Sara Z. Duterte committed culpable violation of the Constitution, graft and corruption, and betrayed public trust by orchestrating a scheme to misuse, divert, and fraudulently liquidate confidential funds amounting to approximately ₱612.5 Million, ₱500 Million of which was released to the Office of the Vice President ("OVP") and ₱112.5 Million of which was released to the Department of Education ("DepEd").

II.
PROPOSED STIPULATION OF FACTS

The Prosecution offers the following facts for stipulation for Article I:

2.1. Atty. Zuleika Lopez is respondent's Chief of Staff in the OVP, having assumed the position on July 26, 2022.

2.2. Respondent issued a letter dated August 22, 2022 ("Request Letter") to Department of Budget Management ("DBM") Secretary Amenah F. Pangandaman requesting for additional budget for fiscal year 2022 in the total amount of ₱403.46 Million. The ₱403.46 Million requested amount included a request for OVP confidential funds in the amount of ₱250 Million.

2.3. The request for OVP confidential funds, as indicated in the Request Letter, was "for and in consideration of the safe implementation of the various projects and activities under the Good Governance program and the conduct of official engagements and functional representation in international and domestic events as instructed by the President."

2.4. In response to the Request Letter, the DBM requested, among others, the physical and financial plan for the proposed confidential funds, as stated in its Response Letter dated September 15, 2022 ("Response Letter").

2.5. On September 19, 2022, in compliance with the Response Letter, the OVP, through its Assistant Chief of Staff, Lemuel G. Ortonio ("Ortonio"), submitted, among others, the requested physical and financial plan, which was prepared by SDO Acosta and approved by respondent.

2.6. Respondent requested that ₱500 Million be granted to the OVP in confidential funds, while ₱150 Million be granted to the DepEd in confidential funds, for 2023.

2.7. A line item for confidential funds to the OVP in the amount of ₱500 Million, and to the DepEd in the amount of ₱150 Million, was included in the National Expenditure Program, which the DBM submitted to Congress;

2.8. In December 2022, the OVP, under the leadership of respondent, was granted confidential funds in the amount of ₱125 Million for the fourth quarter of 2022.

2.9. Upon the request of respondent, the OVP was granted confidential funds in the total amount of ₱500 Million for the fiscal year 2023, or ₱125 Million per quarter.

2.9.1. The OVP had confidential funds in the amount of ₱125 Million for the first quarter of 2023, which covers the period of February 6 to March 29, 2023.

2.9.2. The OVP had confidential funds in the amount of ₱125 Million for the second quarter of 2023, which covers the period April 25 to June 30, 2023.

2.9.3. The OVP had confidential funds in the amount of ₱125 Million for the third (3rd) quarter of 2023 which covers the period of July 14 to September 30, 2023.

2.10. Gina F. Acosta ("Acosta") was the OVP Special Disbursing Officer ("SDO") in relation to the OVP confidential funds for the fourth quarter of 2022, as well as the first, second, and third quarters of 2023.

2.11. SDO Acosta was one of the SDOs respondent designated for the disbursement of confidential funds when the latter served as Mayor of Davao City.

2.12. Colonel Raymund Dante P. Lachica ("Col. Lachica") was the Vice Presidential Security and Protection Group ("VPSPG") Commander.

2.13. On December 20, 2022, SDO Acosta, accompanied by Col. Lachica, encashed Landbank Check No. 0000244027 dated December 20, 2022 issued in her name and in the amount of ₱125 Million, representing OVP confidential funds for the last quarter of 2022, at Landbank – Shaw Boulevard Branch.

2.14. After SDO Acosta encashed Landbank Check No. 0000244027 dated December 20, 2022, representing the OVP confidential funds for the fourth quarter of 2022, she turned the funds over to Col. Lachica.

2.15. In its Accomplishment Report on the Utilization of Confidential and Intelligence Funds for December 21 to 31, 2022, the OVP reported that its ₱125 Million confidential funds for the last quarter of 2022 were spent, as follows:

(a)	purchase of information	–	₱14 Million
(b)	payment of rewards	–	₱10 Million
(c)	rental of safehouses	–	₱16 Million
(d)	purchase of supplies	–	₱35 Million
(e)	medical and food aid	–	₱40 Million
(f)	travel expenses	–	₱10 Million

2.16. The Commission on Audit ("COA") issued Notice of Disallowance ("NOD") No. 2024-002-100 (2022) dated August 8, 2024, disallowing the confidential expenses of the OVP for the period December 21 to 31, 2022 s in the amount of ₱73,287,000.00.

2.16.1. The COA disallowed the OVP's expenditure on payment of rewards totaling ₱69,787,000.00, citing that the OVP failed to fully substantiate and support such expenditures since: (a) it filed to provide documents evidencing the success of the information-gathering and/or surveillance activities; and (b) it was not able to show that the expenses listed in the Accomplishment Report confidential activities were related to the purpose for which confidential funds were released to it.

2.16.2. The COA further disallowed the liquidation of payments for tables, chairs, desktop computers, and printers

in the total amount of ₱3.5 Million, as the evidence of payments did not even specify that these were intended for the confidential operations/activities undertaken by the OVP.

2.17. The COA issued a Notice of Suspension dated December 13, 2023, which suspended the audit of the liquidation of the OVP's confidential funds for the fourth quarter of 2022.

2.18. The OVP filed a Petition for Review, which the COA denied through its Decision No. 2026-017 dated April 10, 2026.

2.19. SDO Acosta, accompanied by Col. Lachica, encashed the following checks issued in her name, all in the amount of ₱125 Million, at Landbank – Shaw Boulevard Branch:

(a) Landbank Check No. 0000244053 dated January 31, 2023, representing OVP confidential funds for the first quarter of 2023;

(b) Landbank Check No. 000245511 dated April 18, 2023, representing OVP confidential funds for the second quarter of 2023; and

(c) Landbank Check No. 0000245664 dated July 13, 2023, representing OVP confidential funds for the third quarter of 2023.

2.20. After SDO Acosta encashed Landbank Check No. 0000244053 dated January 31, 2023, Landbank Check No. 000245511 dated April 18, 2023, and Landbank Check No. 0000245664 dated July 13, 2023, representing the OVP confidential funds for the first three quarters of 2023, she turned the funds over to Col. Lachica.

2.21. The instruction to turn over the OVP confidential funds for the fourth quarter of 2022 and for the first to third quarter of 2023 to Col. Lachica originated from respondent.

2.22. SDO Acosta has no personal knowledge of the payment/distribution of the confidential funds of the OVP to the supposed recipients.

2.23. Julieta Villadelrey is the Chief Accountant of the OVP.

2.24. Ms. Villadelrey certified that the supporting documents included in the Liquidation Reports submitted to the COA are supposedly complete and proper.

2.25. Rosalynne Sanchez is the OVP's Director of Administrative and Financial Services.

2.26. Mr. Ortonio and Ms. Sanchez are signatories to Landbank Check No. 0000244027 dated December 20, 2022, Landbank Check No. 0000244053 dated January 31, 2023, Landbank Check No. 000245511 dated April 18, 2023, and Landbank Check No. 0000245664 dated July 13, 2023, worth ₱125 Million each, covering OVP confidential funds.

2.27. Respondent signed the following documents relating to the disbursement and liquidation of the confidential funds of the OVP for the last quarter of 2022 and the first three quarters of 2023:

(a) Disbursement Voucher dated December 20, 2022;
(b) Disbursement Voucher dated January 31, 2023;
(c) Disbursement Voucher dated April 10, 2023;
(d) Disbursement Voucher dated July 13, 2023;
(e) Certification dated January 10, 2022 (sic.) and notarized January 16, 2023;
(f) Certification dated March 30, 2023;
(g) Certification dated July 11, 2023;
(h) Certification dated October 9, 2023;
(i) Liquidation Report dated January 10, 2023;
(j) Accomplishment Report accompanying the Liquidation Report dated January 10, 2023;
(k) Liquidation Report dated March 29, 2023;
(l) Accomplishment Report accompanying the Liquidation Report dated March 29, 2023;
(m) Liquidation Report dated July 11, 2023;
(n) Accomplishment Report accompanying the Liquidation Report dated July 11, 2023;
(o) Liquidation Report dated October 23, 2023; and
(p) Accomplishment Report accompanying the Liquidation Report dated October 23, 2023.

2.28. Upon the request of respondent as DepEd Secretary, the DepEd was granted confidential funds in the total amount of ₱150 Million for the fiscal year 2023.

2.29. A total of ₱112.5 Million in confidential funds, or ₱37.5 Million per quarter for the first three quarters of 2023, was released to the DepEd.

2.30. Mr. Edward D. Fajarda ("SDO Fajarda") was the DepEd SDO in 2023.

2.31. SDO Fajarda is the husband of Sunshine Charry Fajarda, former DepEd Assistant Secretary and Head Executive Assistant to the Secretary.

2.32. SDO Fajarda, accompanied by DepEd VPSPG Deputy Commander Lieutenant Colonel Dennis D. Nolasco ("Col. Nolasco") encashed the following checks, all payable to him and each worth ₱37.5 Million, representing DepEd confidential funds for the first three quarters of 2023, at the Landbank - DepEd Branch, on the indicated dates of the checks:

(a) Landbank Check No. 0000000453 dated February 20, 2023;

(b) Landbank Check No. 0000000964 dated April 19, 2023;

(c) Landbank Check No. 0000002250 dated July 11, 2023.

2.33. After encashment of the checks for DepEd confidential funds, SDO Fajarda turned the confidential funds over to Col. Nolasco.

2.34. The instruction to turnover the DepEd confidential funds to VPSPG Deputy Commander Nolasco originated from respondent.

2.35. Atty. Michael Welsey Poa was the DepEd Undersecretary and Chief of Staff from May 2023 to July 19, 2024.

2.36. Usec. Poa has no personal knowledge of the payment/distribution of the confidential funds of the DepEd to the supposed recipients.

2.37. The DepEd received the COA's Audit Observation Memorandum ("AOM") No. 2024-015 dated February 1, 2024.

2.38. At the time the DepEd received the AOM No. 2024-015, Atty. Poa was the Officer-in-Charge of the Finance Department of the DepEd and was tasked to respond to the said AOM.

2.39. Nolasco Mempin was the DepEd Undersecretary for Administration from April 2023 to July 19, 2024.

2.40. With the knowledge of respondent, Atty. Poa requested Deped Undersecretary Mempin to secure documents evidencing the success of confidential operations.

2.41. Usec. Poa executed the letter dated April 17, 2024 and attached the Youth Leadership Summit ("YLS") Certifications thereto.

2.42. Usec. Poa executed the Response Letter dated August 27, 2024.

2.43. Respondent signed the following documents relating to the disbursement and liquidation of the confidential funds of the DepEd:

(a) Disbursement Voucher dated February 20, 2023;
(b) Disbursement Voucher dated April 19, 2023;
(c) Undated Disbursement Voucher with DV No. 23-07-10502;
(d) Certification dated March 31, 2023;
(e) Certification dated June 30, 2023;
(f) Certification dated October 2, 2023;
(g) Liquidation Report dated March 31, 2023;
(h) Accomplishment Report accompanying the Liquidation Report dated March 31, 2023;
(i) Liquidation Report dated June 30, 2023;
(j) Accomplishment Report accompanying the Liquidation Report dated June 30, 2023;
(k) Liquidation Report dated September 29, 2023; and
(l) Accomplishment Report accompanying the Liquidation Report dated September 29, 2023.

2.44. In its AOM No. 2024-015 dated February 1, 2024, the COA flagged ₱75 Million in DepEd confidential expenses from February 20 to June 29, 2023, citing that the submitted liquidation reports were not fully supported by complete and proper documentation.

2.45. The authenticity of the TSNs and video recordings of the hearings conducted by the Committee on Good Government and Public Accountability ("CGGPA") dated September 18, 2024, September 25, 2024, October 17, 2024, November 5, 2024, November 11, 2024, November 20, 2024, November 25, 2024, and December 9, 2024.

2.46. The authenticity of the documentary submissions of the CGGPA to the House of Representatives Legislative Library, Archives and Museum.

2.47. The authenticity of the documentary submissions of the COA in relation to the OVP's submissions for the liquidation of confidential funds for the last quarter of 2022 and the first to third quarters of 2023.

2.48. The authenticity of the documentary submissions of the COA in relation to the DepEd's submissions for the liquidation of confidential funds for the first three quarters of 2023.

2.49. The authenticity of the documentary submissions of the National Bureau of Investigation Questioned Document Division ("NBI-QDD") in relation to the examination of thirty-six (36) documentary evidence of payment ("DEPs") the OVP and the DepEd submitted to the COA.

2.50. The authenticity of the documentary submissions of the Philippines Statistics Authority ("PSA") in relation to its verification of records of birth, marriage, and death of names of individuals submitted by the House of Representatives.

III.
ISSUE FOR RESOLUTION

The Prosecution respectfully submits that the issue in relation to Article I be limited to the following:

3.1. Whether respondent committed culpable violation of the Constitution, graft and corruption, and betrayed public trust through the systematic misuse, misappropriation, and irregular liquidation of confidential funds worth ₱500 Million released to the OVP for the fourth quarter of 2022 and the first to third quarters of 2023, and ₱112.5 Million released to the DepEd for 2023.

IV.
WITNESSES TO BE PRESENTED

4.1. The Prosecution intends to present the following witnesses to testify on matters relevant and material to the Articles of Impeachment and for the specified purposes:

	Witness	Purpose of Testimony
1	**Marivic Pareja**	To authenticate and identify House records, TSNs, video recordings, and certifications relating to congressional hearings on confidential funds and impeachment proceedings; to confirm the transmittal, receipt, archival, maintenance, retrieval of such records.
2	**Amenah Pangandaman / DBM Representative**	To testify on respondent's requests for OVP and DepEd confidential funds and DBM's release and inclusion of such funds in the national budget.
3	**Roderick Wamil / COA Representative**	To testify on COA audit findings, deficiencies in liquidation documents, notices of suspension/ disallowance, and non-compliance with confidential fund rules in relation to the subject OVP and DepEd confidential funds
4	**Edward Fajarda**	To testify on the withdrawal, turnover, liquidation, and control by respondent over DepEd confidential funds.
5	**Col. Raymund Dante Lachica**	To testify on the receipt and utilization of confidential funds.
6	**Lt. Col. Dennis D. Nolasco**	To testify on the receipt and utilization of confidential funds.
7	**Atty. Michael Wesley Poa**	To testify on the DepEd's responses to COA audit findings and his procurement and submission of supporting documents despite having no personal knowledge of confidential fund expenditures.

8	**Undersecretary Nolasco Mempin**	To testify on obtaining YLS certifications used in DepEd liquidations despite lacking personal knowledge of confidential fund operations.
9	**Nenita Camposano**	To testify on the encashment and physical withdrawal of DepEd confidential funds from Landbank.
10	**Gina F. Acosta**	To testify on the withdrawal, turnover, certification, liquidation, and control by respondent over OVP confidential funds.
11	**Julieta Villadelrey**	To testify on accounting certifications and supporting documents for OVP confidential fund liquidations.
12	**Rosalynne Sanchez**	To testify on the issuance and signing of OVP checks covering confidential funds.
13	**Lemuel G. Ortonio**	To testify on approval of disbursement vouchers, signing of checks, audit responses, and supporting documents for OVP confidential funds.
14	**Violeta Constantino**	To testify on the encashment and physical withdrawal of OVP confidential funds from Landbank.
15	**Ramil L. Madriaga**	To testify on the delivery of OVP confidential funds to designated recipients and the falsity of supporting liquidation documents.
16	**Richard Babagay**	To corroborate the testimony of Ramil Madriaga regarding the receipt and transport of confidential funds.
17	**Caroline Moldez-Pitoy**	To testify on NBI forensic examination findings indicating similarities and irregularities in signatures and handwriting on liquidation documents

18	**Atty. Reynold Munsayac**	To testify on Madriaga's allegations regarding the delivery of OVP confidential funds at Nommu Basho
19	**Atty. Aurea Quilala**	To testify on Madriaga's allegations regarding the delivery of OVP confidential funds at SM Megamall.
20	**Marizza Grande**	To testify on PSA verification results showing that many listed recipients of confidential funds had no corresponding civil registry records.
21	**Former ISAFP Officer or other intelligence operations expert**	To testify that the reported intelligence and surveillance activities were inconsistent with legitimate intelligence operations and practices.
22	**Commissioner Douglas Malilin/Nilda Plaras/Gloria Camora**	To prove that the disbursement and liquidation of OVP and DepEd confidential funds were not properly documented and did not comply with the proper liquidation procedure under Joint Circular No. 2015-01
23	**Lt. Col. Manaros M. Boransing Ii / Lt. Col. Magtangol Panopio / Lt. Col. Carlos Sangdaan, Jr. / Maj. Gen. Adonis Bajao / AFP Representatives**	To prove that the YLS/IEC activities were funded by the Philippine Army and the concerned LGUs for student-participants, and that no funds from the Department of Education were used in any of these activities.
24	**Atty. Zuleika Tanglao Lopez**	To prove that respondent misused and misappropriated confidential funds.
25	**Mary Grace Piattos**	To testify on their alleged receipt of confidential funds
	RESERVE WITNESS	
26	**Corroborative witness**	To testify on the delivery of funds to designated recipients and/or the falsity of supporting liquidation documents.
27	**Alleged recipients of OVP/DepEd confidential funds**	To confirm the non-receipt of OVP and DepEd confidential funds despite appearing on the recipient list.

	(whose names appear in the OVP and DepEd recipient list but who never actually received any funds)	

4.2. The Prosecution reserves the right to present additional or substitute witnesses as the circumstances may warrant.

V.
DOCUMENTS TO BE PRESENTED

5.1. The Prosecution intends to present the following documentary evidence to prove the material allegations of the Articles of Impeachment, the contents of the documents, and for the specified purposes:

	Document	Purpose
	TSNs and videos of CGGPA Hearings (September 18 and 25, 2024; October 17, 2024; November 5, 2024; November 11, 2024; November 20, 2024; November 25, 2024; December 9, 2024)	To establish the House inquiry into OVP/DepEd confidential funds; respondent's control over fund disbursement and liquidation.
	CGGPA Committee Report No. 1503 (19th Congress)	
	TSNs and videos of COJ Hearings (March 2, 3, 4, 25, 2026; April 14, 22 29, 2026)	To establish the Impeachment proceedings and approval of Articles of Impeachment.
	Affidavit of Authentication (videos of CGGPA and COJ hearings)	To authenticate the videos of the subject CGGPA and COJ hearings.
	Letter correspondences — OVP and DBM (OVP letter dated August 22, 2022; DBM letter dated September 15, 2022; OVP letter dated September 19,	To prove respondent's request for ₱250 Million in OVP confidential funds.

	2022; OVP letter dated October 11, 2022)	
	Davao City Confidential Funds Letters (September 30, 2016; December 28, 2016; April 3, 2017; June 28, 2017; September 26, 2017; December 29, 2017; April 6, 2018; June 25, 2018; December 27, 2018; March 29, 2018; July 3, 2019; September 20, 2019; December 27, 2019; June 30, 2020; October 6, 2020; December 29, 2020; March 17, 2021; March 31, 2021; July 2, 2021; September 30, 2021; December 27, 2021; April 5, 2022; June 27, 2022)	To establish records of respondent's access to and liquidation of confidential funds as Mayor of Davao City.
	OVP Certifications (January 10, 2023; March 30, 2023; July 11, 2023; and October 9, 2023)	Certifications on release, use, and liquidation of ₱500 Million OVP confidential funds.
	OVP Accomplishment Reports (undated for December 21 to 31, 2022; March 30, 2023; July 11, 2023; and October 9, 2023)	Reports on utilization and accomplishments funded by confidential funds.
	PSA Certifications (OVP and DepEd) (November 25, 2024; December 4, 2024; December 8, 2024; December 11, 2024)	To prove verification of purported recipients of confidential funds and that many names of such recipients are fictitious or unverified.
	OVP DEPs	To establish disbursement records containing ghost recipients and irregularities.
	OVP DEPs – Common Names with DepEd recipients	To prove that same payees appear in OVP and DepEd records.

	OVP DEPs – Repeated Names	To prove that the same individuals allegedly received funds multiple times.
	OVP DEPs – Similar Handwriting	To prove that different recipients' entries appear written by the same hand.
	OVP DEP ("Mary Grace Piattos")	To provide an example of a fictitious recipient.
	OVP DEPs – Wrong Dates	To prove that disbursements were allegedly made when no funds were available.
	OVP DEPs – Improbable Disbursements	To prove that there were same-day payments across distant locations.
	Joint Circular No. 2015-01 dated January 8, 2015	To prove the rules on confidential funds and accountability of agency heads.
	Letters to NBI (April 2, 7, and 8, 2025)	To prove that the HOR requested the NBI to conduct a forensic examination of the OVP DEPs.
	NBI Questioned Documents Report Nos. 130-425 and 302-724	To prove that DEPs were falsified.
	Liquidation Reports (March 29, 2023; January 10, 2023, July 11, 2023; and October 23, 2023)	To prove that respondent made it appear that the confidential funds were used for legitimate reasons.
	Disbursement Vouchers (December 20, 2022; January 31, 2023; April 10, 2023; July 13, 2023; December 20, 2022; January 31, 2023; April 18, 2023; and July 13, 2023)	To prove that who requested, approved, and certified the release of confidential funds.
	Landbank Checks (LB Check No. 0000244027 dated December 20, 2022; LB Check No. 0000244053 dated January 31, 2023; and	To prove that a payout for OVP confidential funds was authorized.

	LB Check No. 0000245664 dated July 13, 2023)	
	Audit Observation Memorandum (AOM No. 2024-170 dated August 8, 2024; AOM No. 2024-014 dated February 1, 2024; AOM No. 2023-211 dated September 14, 2023; AOM No. 2023-213 dated October 3, 2023; AOM No. 2025-171 dated August 8, 2024 and AOM No. 2025-015 dated February 1, 2024)	To prove that the COA flagged the OVP's disbursements of its confidential funds in 2022 and 2023.
	Responses to AOM (October 19, 2023; November 30, 2023; April 19, 2024; August 27, 2024)	To prove that the OVP made a response to COA's findings of lapses in the OVP's disbursements of its confidential funds.
	Lachica Certifications (April 4, 2024 and September 30, 2023)	To prove that the OVP made it appear that the confidential activities of the OVP were performed legally.
	Protective Intelligence Operations Report for the Engagements of Vice President Sara Z. Duterte (Q1 and Q3 2023)	To prove that the OVP utilized confidential funds for activities which do not fall under confidential activities, according to Joint Circular No. 2015-01.
	Notice of Suspension dated December 13, 2023	To prove that the COA suspended the audit of the liquidation of the ₱125 Million OVP confidential funds for the fourth quarter of 2022.
	Letter dated March 13, 2024	To prove that the OVP admitted that the confidential funds were spent on activities which have no relation to surveillance of confidential operations.
	Notice of Disallowance dated August 8, 2024	To prove that the COA disallowed the amount of ₱73,287,000.00 in relation to liquidation of OVP confidential fund expenditures.

	Petition for Review dated February 3, 2025	To prove that the OVP appealed the Notice of Disallowance dated August 8, 2024.
	COA Decision dated April 10, 2026	To prove that the COA denied the OVP's appeal/Petition.
	Notice of Disallowance dated March 31, 2026	To prove that the COA disallowed the amount of ₱375 Million in relation to liquidation of OVP confidential fund expenditures.
	Physical Financial Plan (2022 and 2023)	To prove that respondent approved the request for funds for confidential expenses.
	Affidavits of Ramil Madriaga (Affidavit dated November 29, 2025; Supplemental Affidavit dated April 11, 2026)	To prove that respondent misappropriated the confidential funds of the OVP for the fourth quarter of 2022.
	DepEd Certifications (March 31, 2023; June 30, 2023; October 2, 2023)	Certifications on release, use, and liquidation of ₱500 Million in OVP confidential funds.
	DepEd Accomplishment Reports (March 31, 2023; June 30, 2023; September 30, 2023)	Reports on utilization and accomplishments funded by confidential funds.
	Letter Requests to PSA for Verification	To prove that CGGPA requested verification of payees of OVP and DepEd confidential funds.
	DepEd DEPs with missing names	To prove that the DepEd submitted DEPs with payee names either in blank, unreadable, incomplete, are unsigned, or are undated.
	DepEd DEPs signed on the same days but involving distant cities/provinces	To prove the fictitious signing of the DEPs.
	DepEd DEPs – Repeated Names	To prove that same individuals received funds multiple times.
	DepEd DEPs – Similar Handwriting	To prove that different recipients' entries appear written by the same hand.

	DepEd DEPs – same signature, different names	To prove that different recipients' entries appear signed by the same hand.
	DepEd Liquidation Reports (March 31, 2023 for ₱37.5 Million drawn on February 20, 2023; June 30, 2023 for ₱37.5 Million drawn on April 19, 2023; September 29, 2023 ₱37.5 Million drawn on July 11, 2024)	To prove that respondent made it appear that the confidential funds were used for legitimate purposes.
	Disbursement Vouchers (January 31, 2023; April 19, 2023; July 11, 2023; and February 20, 2023)	To prove who requested, approved, and certified the release of confidential funds.
	Landbank Checks (Check No. 0000000453 - February 20, 2023; Check No. 0000000964 - April 19, 2023; Check No. 0000002250 - July 11, 2023)	To prove that a payout for DepEd confidential funds was authorized.
	Audit Observation Memorandum (AOM No. 2024-015 dated February 1, 2024; AOM No. 2024-171 dated August 8, 2024)	To prove that the COA flagged the DepEd's disbursements of its confidential funds in 2022 and 2023.
	Responses to AOMs (Response to AOM No. 2024-014 dated April 17, 2024; Response to AOM No. 2024-171 dated August 22, 2024)	To prove that the DepEd responded to the COA's findings of lapses in the disbursements of its confidential funds.
	YLS Certifications (January 1, 2024; December 30, 2023; December 5, 2023; Bajao's undated letter, December 12, 2023; July 1, 2024; September 25, 2023;	To prove that the DepEd made it appear that the YLS and IEC activities were part of the confidential operations conducted by the DepEd.

	December 10, 2023; and other YLS Certifications)	
	Position Papers, Letters, and Compliance by the OVP and DepEd (VP Position Paper dated Sept 23, 2024; letter dated Oct 7, 2024 issued by Lopez; letter dated Oct 7, 2024 issued by Fajarda; letter dated Oct 7, 2024 issued by Sanchez; letter dated Oct 7, 2024 issued by Ortonio; Position Paper of Lopez, *et al.* dated Nov 5, 2024; Position Paper of Satellite Offices and other OVP Employees dated Nov 5, 2024; letter dated Nov 12, 2024; VP letter dated Nov 19, 2024; Compliance with *Subpoena Duces Tecum* dated Aug 16, 2024; *Subpoena* dated Aug 16, 2024; OVP letter to COA dated Aug 21, 2024)	To prove that respondent requested to withhold the information pertaining to confidential funds.
	Counter-Affidavits of OVP and DepEd staff (Counter-Affidavit of Col. Lachica dated June 30, 2025; Counter-Affidavit of Edward Fajarda dated June 30, 2025; Counter-Affidavit of Gina Costa dated June 30, 2025; Counter-Affidavit of Col. Nolasco dated June 30, 2025; Counter-Affidavit of Maj. Gen. Mempin dated June 30, 2025; Counter-Affidavit of Atty. Sunshine Fajarda dated June 30, 2025)	To prove that a case was filed against respondent and her OVP and DepEd staff for Technical Malversation, Falsification, and Perjury, among others.

RESERVE EVIDENCE		
	Armed Forces of the Philippines ("AFP") Service records of Col. Raymund Dante P. Lachica	To prove that Col. Lachica was a public officer at the time he received the confidential funds and that he had no legitimate basis to receive confidential funds.
	AFP Service records of Lt. Col. Dennis D. Nolasco	To prove that Col. Nolasco was a public officer at the time he received the confidential funds and that he had no legitimate basis to receive confidential funds.
	NBI Questioned Documents Report	To prove that the DEPs submitted by both the OVP and DepEd were executed by the same individuals.
	PSA Documents (List of named recipients in ARs who were already deceased when they supposedly received confidential funds)	To prove that the list of named recipients in the Acknowledgment Receipts (ARs) included recipients who were already deceased when they supposedly received confidential funds.
	PSA Documents (on single positive matches of named recipients in the Acknowledgment Receipts)	To prove that the alleged payees and recipients of the OVP and DepEd confidential funds did not actually receive any payment of confidential funds.
	Affidavit of authentication	To authenticate electronic evidence to be presented.
	Documents establishing qualifications of witnesses	To prove qualifications/expertise of witnesses.

5.2. The Prosecution reserves the right to present other documentary evidence as the exigencies of trial may require.

ARTICLE II:
UNEXPLAINED WEALTH, FALSE SALNs, AND CONTINUED BUSINESS INTERESTS

I.
THE PROSECUTION'S CLAIMS

1.1. Respondent Vice President Sara Z. Duterte committed culpable violation of the Constitution and betrayed public trust when she:

(1) amassed wealth manifestly disproportionate to her lawful income during her incumbency as a public official, including as Vice President;

(2) failed to disclose assets and bank holdings in her Statement of Assets, Liabilities, and Net Worth ("SALN"), including in her SALN for 2022, 2023, and 2024; and

(3) failed to divest and willfully continued prohibited business interests while serving as Vice President for 2022, 2023, 2024, and 2025.

II.
PROPOSED STIPULATION OF FACTS

The Prosecution offers the following facts for stipulation for Article II:

2.1. Respondent has been married to Atty. Manases Reyes Carpio since October 27, 2007.

2.2. Respondent and her spouse did not enter into any marriage settlement agreement prior to their marriage.

2.3. Respondent began her term as Vice President of the Republic of the Philippines on June 30, 2022.

2.4. Respondent was the Vice Mayor of Davao City from 2007 to 2009.

2.5. Respondent was the Mayor of Davao City from 2010 to 2012 and 2016 to 2021.

2.6. The certified true copies of respondent's Statement of Assets, Liabilities and Net Worth ("SALN") for the years 2007 to 2012 and 2016 to 2024 submitted by the Office of the Ombudsman during the hearing held on April 22 are true and authentic copies of respondent's SALN which she filed for the years 2007 to 2012 and 2016 to 2024.

2.7. Respondent's SALN for the years 2007 to 2012 and 2016 to 2024 reflect the following information regarding her net worth:

Year	Net Worth
2007	₱7,250,497.00
2008	₱18,493,616.65
2009	₱18,281,264.65
2010	₱16,242,886.65
2011	₱14,271,148.46
2012	₱22,116,101.93
2013	Not in office
2014	Not in office
2015	Not in office
2016	₱34,895,997.00
2017	₱44,828,759.00
2018	₱49,699,728.00
2019	₱55,613,051.00
2020	₱56,583,735.10
2021	₱65,308,841.00
2022	₱71,058,841.00
2023	₱77,508,841.00
2024	₱88,512,370.22

2.8. Respondent's SALN for the years 2007 to 2012 and 2016 to 2024 reflect the following information regarding her real assets, personal assets, cash on hand/cash in bank, total assets, total liabilities, and total net worth:

Year	Real Assets	Personal Assets	Cash on Hand/Cash in Bank	TOTAL ASSETS	TOTAL LIABILITIES	TOTAL NET WORTH
2007	3,774,697.00	5,475,800.00	2,000,000.00	9,250,497.00	2,000,000.00	7,250,497.00
2008	15,563,468.65	4,705,148.00	2,000,000.00	20,268,616.65	1,775,000.00	18,493,616.65
2009	10,802,668.65	9,368,596.00	2,800,000.00	20,171,264.65	1,890,000.00	18,281,264.65
2010	10,802,668.65	10,748,218.00	3,661,622.00	21,550,886.65	5,308,000.00	16,242,886.65
2011	10,802,668.65	11,017,721.80	3,931,125.80	21,820,390.43	7,549,242.00	14,271,148.45
2012	18,591,708.93	12,217,128.00	4,320,532.00	30,808,836.93	8,692,735.00	22,116,101.93
2013	NOT IN PUBLIC OFFICE					

2014	NOT IN PUBLIC OFFICE					
2015	NOT IN PUBLIC OFFICE					
2016	30,548,891.00	11,301,560.00	3,750,760.00	41,850,451.00	6,954,454.00	34,895,997.00
2017	30,548,891.00	20,593,056.00	6,368,506.00	51,141,947.00	6,313,188.00	44,828,759.00
2018	36,798,891.00	19,019,950.00	3,795,000.00	55,818,841.00	6,119,113.00	49,699,728.00
2019	39,798,891.00	19,274,950.00	None	59,073,841.00	3,460,790.00	55,613,051.00
2020	39,798,891.00	19,274,950.00	None	59,073,841.00	2,490,105.90	56,583,735.10
2021	48,958,891.00	23,849,950.00	None	72,808,841.00	7,500,000.00	65,308,841.00
2022	50,958,891.00	23,849,950.00	None	74,808.841.00	3,750,000.00	71,058,841.00
2023	54,808,891.00	25,249,950.00	None	80,058,841.00	2,550,000.00	77,508,841.00
2024	66,808,891.00	31,653,479.22	None	98,462,370.00	9,950,000.00	88,512,370.22

2.9. Respondent did not declare cash, whether on hand or in bank, in her SALN for the years 2019 to 2024.

2.10. The certified true copies of Metro City Chow Foods Corporation's Articles of Incorporation ("AOI"), General Information Sheets ("GIS") for the years 2018 to 2025 and Audited Financial Statements ("AFS") for the years 2017 to 2024 submitted by the Securities and Exchange Commission ("SEC") during the hearing held on April 22 are true and authentic copies of the documents filed by Metro Chow Foods Corporation with the SEC.

2.11. The certified true copies of City Hall King Chow Foods Corporation's GIS for the years 2008 to 2021 and AFS for the years 2007 to 2020 submitted by the SEC during the hearing held on April 22 are true and authentic copies of the documents filed by City Hall King Chow Foods Corporation with the SEC.

2.12. The certified true copies of Gencorp Industries, Inc.'s GIS for the years 2021 to 2025 and AFS for the years 2021 to 2024 submitted by the SEC during the hearing held on April 22 are true and authentic copies of the documents filed by Gencorp. Industries, Inc. with the SEC.

2.13. The certified true copy of Carpio Lawyer's Articles of Partnership submitted by the SEC during the hearing held on April 22 is a true and authentic copy of the document filed by Carpio Lawyers with the SEC.

2.14. The entity/business enterprise "888 Bistro" declared by respondent in her SALN for the years 2021 to 2024 is not registered with the SEC.

2.15. The certified true copies of CALE88 Foods Corporation's GIS for the years 2022 to 2025 and AFS for the years 2021 to 2023 submitted by SEC during the hearing held on April 22

are true and authentic copies of the documents filed by CALE88 Foods Corporation with the SEC.

2.16. The entity/business enterprise "Madayaw Fisheries Corp." declared by respondent in her SALN for the year 2024 is not registered with the SEC.

2.17. The certified true copy of Madayaw Fisheries, Inc.'s AOI submitted by the SEC during the hearing held on April 22 is a true and authentic copy of the document filed by Madayaw Fisheries, Inc. with the SEC.

2.18. The certified true copies of Mati City Ice Plant and Cold Storage, Inc.'s GIS for the years 2024 to 2026 and AFS for the years 2023 to 2024 submitted by the SEC during the hearing held on April 22 are true and authentic copies of the documents filed by Mati City Ice Plant and Cold Storage, Inc. with the SEC.

2.19. The certified true copy of Amianan Shores, Inc.'s AOI submitted by the SEC during the hearing held on April 22 is a true and authentic copy of the document filed by Amianan Shores, Inc. with the SEC.

2.20. The certified true copies of Geometry Security and Investigation Agency, Inc.'s GIS for the years 2023 to 2025 and AFS for the years 2024 to 2025 submitted by the SEC during the hearing held on April 22 are true and authentic copies of the documents filed by Geometry Security and Investigation Agency, Inc. with the SEC.

2.21. The certified true copy of Cabletow 88 Shipping and Marine Services Inc.'s AOI submitted by the SEC during the hearing held on April 22 is a true and authentic copy of the document filed Cabletow 88 Shipping and Marine Services Inc. with the SEC.

2.22. Respondent is an incorporator, director, officer, and shareholder of Metro City Chow Foods Corporation for 2018 to 2025.

2.23. Respondent is a member of the Board of Directors, of the Executive Committee, and of the Compensation Committee of Metro City Chow Foods Corporation for 2022, 2023, 2024, and 2025.

2.24. Respondent is a stockholder of Metro City Chow Foods Corporation and maintains at least 20% ownership of it.

2.25. Respondent is a director/officer and shareholder of City Hall King Chow Foods Corporation for 2008 to 2019.

2.26. Respondent maintained shareholdings in Gencorp Industries, Inc. for the year 2024.

2.27. Respondent's spouse is an incorporator, director, and shareholder of Madayaw Fisheries, Inc.

2.28. Respondent's spouse is an incorporator, director, and shareholder of Amianan Shores, Inc.

2.29. Respondent's spouse is a director/officer and shareholder of Cabletow 88 Shipping and Marine Services, Inc.

2.30. Respondent's spouse is a director/officer and shareholder of CALE88 Foods Corporation for 2022 to 2025.

2.31. Respondent's spouse is a director/officer and shareholder in Mati City Ice Plant and Cold Storage, Inc. for 2024 to 2026.

2.32. Respondent's spouse is a director/officer and shareholder of Geometry Security and Investigation Agency, Inc. for the years 2023 to 2025.

2.33. Metro City Chow Foods Corporation reported the following annual net income/loss for 2017 to 2024 in its AFS for the specified years:

Year	Net Income/(Loss) (in Php)
2017	321,233.00
2018	462,277.00
2019	600,267.00
2020	(1,963,403.00)
2021	(1,176,762.00)
2022	(906,930.00)
2023	(388,625.00)
2024	(309,860.00)
Total Net Income/Loss	(3,361,803.00)

2.34. Cityhall King Chow Foods Corporation reported the following annual net income/loss for 2007 to 2020 in its AFS for the specified years:

Year	Net Income/(Loss) (in Php)
2007	(436,915.00)
2008	(454,901.00)
2009	87,726.00
2010	4,863.00
2011	205,522.00
2012	48,116.00
2013	607,132.00
2014	647,804.00
2015	899,270.00
2016	11,834.00
2017	48,308.00
2018	(149,093.00)
2019	-
2020	-
Total Net Income/Loss	1,519,666.00

2.35. Gencorp Industries, Inc. reported the following annual net income/loss for 2021 to 2024 in its AFS for the specified years:

Year	Net Income/(Loss) (in Php)
2021	182,794.00
2022	1,831,093.00
2023	2,700,451.00
2024	3,324,836.00
Total Net Income/Loss	8,039,174.00

2.36. CALE88 FOODS Corporation reported the following annual net income/loss for 2021, 2022, and 2023 in its AFS for the specified years:

Year	Net Income/(Loss) (in Php)
2021	-
2022	(42,255.05)
2023	(1,880,781.66)
Total Net Income/Loss	(1,923,036.71)

2.37. Mati City Ice Plant and Cold Storage, Inc. reported the following annual net income/loss for 2023 and 2024 in its AFS for the specified years:

Year	Net Income/Loss (in Php)
2023	(394,939.00)
2024	411,788.00
2023	(1,880,781.66)
Total Net Income/Loss	(1,863,932.66)

2.38. Geometry Security and Investigation Agency, Inc. reported the following annual net income/loss for 2024 and 2025 in its AFS for the specified years:

Year	Net Income/Loss (in Php)
2024	(1,434,960.00)
2025	(4,851,490.00)
Total Net Income/Loss	(6,286,450)

2.39. When respondent assumed office as Vice President, she did not divest, and continued to retain, her business interests in the following companies:

(a) Metro City Chow Foods Corp.; and
(b) Gencorp Industries Inc.

2.40. Respondent did not fully and truthfully declare all her and her spouse's assets in all her SALNs.

2.41. Respondent amassed wealth so much more than her income and earnings during her incumbency as a public official.

2.42. Respondent and her spouse obtained ill-gotten wealth which were not declared in respondent's SALNs.

III.
ISSUES FOR RESOLUTION

The Prosecution respectfully submits that the issue in relation to Article II be limited to the following:

3.1. Whether respondent committed culpable violation of the Constitution and betrayal of public trust by amassing

unexplained wealth manifestly disproportionate to her lawful income and earnings during her incumbency as a public official.

3.2. Whether respondent committed culpable violation of the Constitution and betrayal of public trust by failing to fully and truthfully disclose all her and her spouses' assets, liabilities, and net worth in her SALNs, including for 2022, 2023, and 2024.

3.3. Whether respondent committed culpable violation of the Constitution and betrayal of public trust by failing to divest, and instead, willfully retaining all her business interests, during her tenure as Vice President for 2022, 2023, 2024, and 2025.

IV.
WITNESSES TO BE PRESENTED

4.1. The Prosecution intends to present the following witnesses to testify on matters relevant and material to the Articles of Impeachment and for the specified purposes:

	Witness	Purpose of Testimony
1	**Bureau of Internal Revenue (BIR) Representative**	To establish the declared income of respondent and her spouse, income/losses of the corporations where they hold business interests, and other relevant matters; authenticate relevant documents.
2	**Department of Budget and Management / Commission on Audit Representative**	To establish respondent's lawful income and declared earnings from 2007 to 2024; identify and authenticate relevant documents.
3	**Atty. Gerardo F. Del Rosario / SEC Representative**	To establish the respondent and her spouse's business interests, corporate holdings and positions, corporate profits/losses per SEC records; identify and authenticate relevant documents in relation to this case.
4	**Land Registration Authority / Land Transportation Office Representative**	To identify respondent and her spouse's real properties and motor vehicles, including undisclosed assets.

5	**Ombudsman Jesus Crispin Remulla /Atty. Karen S. Batu / Office of the Ombudsman Representative**	To identify respondent's SALNs and disclosed business interests.
6	**Civil Service Commission (CSC) Representative**	To testify on the proper reporting/ classification assets and liabilities in the SALN.
7	**Anti-Money Laundering Council (AMLC) Executive Director Ronel U. Buenaventura / AMLC Representative**	To testify on CTRs and STRs submitted by banks to the AMLC from 2006 to 2024 involving respondent and her spouse and investigation reports made by the AMLC involving the covered and suspicious transactions; to authenticate relevant documents.
8	**Financial Forensic Analyst/s**	To provide a financial analysis of respondent's wealth and financial transactions, including the corporations where they have business transactions based on bank records, reports/documents from the AMLC/SEC/DTI/BIR/other government agencies, and all other relevant documents.
9	**Bank Representatives**	To present records relating to respondent and her spouse's bank accounts, including balances, transactions, and other relevant account and transactions records.
10	**Antonio Trillanes IV**	To testify on respondent's and her spouse's unexplained wealth and their receipt of funds from known drug personalities and other unlawful sources.
11	**Philippine National Police Firearms and Explosives Office (PNP FEO) Representative**	To present records relating to firearms registered in the names of respondent and her spouse.

12	**Firearms Dealer**	To prove the acquisition cost and value of the firearms licensed to respondent and/or her spouse.
13	**Representatives from franchising companies such as Jollibee**	To prove that respondent has business interests in various franchising enterprises and the income generated by such businesses.
14	**Melchor Carandang**	To prove that he investigated the bank accounts and transactions of respondent and Rodrigo Duterte, and the result thereof.
15	**Department of Trade and Industry (DTI) Representative**	To prove respondent's and her spouse's business interest in 888 Bistro and Zelta Matiem Salon

4.2. The Prosecution reserves the right to present additional or substitute witnesses, as the circumstances may warrant.

V.
DOCUMENTS TO BE PRESENTED

5.1. The Prosecution intends to present the following documentary evidence to prove the material allegations of the Articles of Impeachment, the contents of the documents, and for the specified purposes:

	Document	Purpose
	Contents of BIR box (containing submissions of the BIR pursuant to the COJ subpoena)	To establish the declared income and expenses of respondent and her spouse as well as their businesses.
	AOI of the following: • Metro City Chow Foods Corporation; • Madayaw Fisheries, Inc.; • Amianan Shores, Inc.; • Cabletow 88 Shipping and Marine Services, Inc.	To prove respondent and her spouse corporate interests and ownership, and corporate positions.

	Articles of Partnership of Carpio Lawyers (formerly, Carpio & Duterte Lawyers)	To prove respondent and her spouse's corporate interests and ownership, and corporate positions.
	Certification of Non-Registration for the following: • Madayaw Fisheries Corp.	To establish that the corporation, which is reported in respondent's SALN, is not registered with the SEC.
	GIS of the following: • City Hall King Chow Foods Corporation (2007 to 2021); • Metro City Chow Foods Corporation (2017 to 2024); • Gencorp Industries, Inc. (2021 to 2024); • CALE88 Foods Corporation (2021 to 2025); • Mati City Ice Plant and Cold Storage, Inc. (2023 to 2026); and • Geometry Security and Investigation Agency, Inc. (2023 to 2025).	To prove respondent's and her spouse's corporate interests, ownership, and positions in the Duterte businesses/companies.
	AFS of the following: • City Hall King Chow Foods Corporation (2007 to 2020); • Metro City Chow Foods Corporation (2017 to 2024); • Gencorp Industries, Inc. (2021 to 2024); • CALE88 Foods Corporation (2021 to 2025); • Mati City Ice Plant and Cold Storage, Inc. (2023 to 2026); • Geometry Security and Investigation Agency, Inc. (2023 to 2025).	To prove the income/losses, assets, liabilities, capitalization, and other financial information about respondent's and her spouses business interests.

	Respondent's SALNs for 2007 to 2025	To establish declared assets, liabilities, net worth, and business interests.
	***Subpoena* dated April 15, 2026**	To show that the AMLC was directed to testify and produce records before the COJ.
	AMLC letter dated April 22, 2026	To show that the AMLC submitted covered transaction reports (CTRs), suspicious transaction reports (STRs), Field Investigation Reports, and other investigation reports.
	AMLC Covered and Suspicious Transaction Reports (2007 to 2025)	To establish covered and suspicious financial transactions.
	AMLC Financial Intelligence Reports	To prove respondent and her spouse's flow of funds, suspicious patterns, and potential predicate crimes based on mandatory submissions of covered institutions
	AMLC Investigation Reports/Confidential Information Sharing	To trace and analyze financial flows and transaction patterns in the bank accounts of respondent and her spouse.
	Antonio Trillanes IV's *Sinumpaang Salaysay* dated April 21, 2026 and its annexes	To prove, among others, that respondent accumulated unexplained and illicit wealth and failed to declare it in her SALNs, showing the pattern of her corrupt conduct.
	Antonio Trillanes IV's *Affidavit of Authentication*	To authenticate the electronic evidence mentioned in the *Sinumpaang Salaysay*.
	CSC Position Paper; correspondences with the Civil Service Commission	To testify on the proper reporting/ classification assets and liabilities in the SALN.

	RESERVE EVIDENCE	
	BIR registration documents of Sara Duterte-Carpio and Manases Carpio	To establish the BIR registration status of respondent and her spouse;
	Certificate of Compensation Payment/Tax Withheld of Sara Duterte-Carpio and Manases Carpio	To establish the total personal income and earnings of respondent and her spouse.
	Annual income tax returns (ITRs) of Sara Duterte-Carpio and Manases Carpio	To establish the total declared personal income and earnings of respondent and her spouse.
	Quarterly Value-Added Tax Return of the following: • Metro City Chow Foods Corporation (2007 to 2025); • Gencorp Industries, Inc. (2021 to 2025); • Carpio Lawyers (formerly, Carpio & Duterte Lawyers) (2007 to 2025); • 888 Bistro (2021 to 2025); • CALE88 FOODS Corporation (2021 to 2025); • Madayaw Fisheries, Inc. (2021 to 2025); • Mati City Ice Plant and Cold Storage, Inc. (2023 to 2025); • Amianan Shores, Inc. (2023 to 2025); • Geometry Security and Investigation Agency, Inc. (2023 to 2025); • Cabletow 88 Shipping and Marine Services, Inc. (2024 to 2025);	To establish the quarterly sales and purchases of the various business interests of respondent and her spouse.

	• Davao New Royal Taipan Corp. (2007 to 2025); • Davao Emerging Taipans Corp. (2007 to 2025); • Davao Bounty Times Food Corp. (2007 to 2025); • SGT Fortune Horse Corp. (2007 to 2025); • CYKT, Inc. (2007 to 2025); • 3Kids Trucking Services, Inc. (2007 to 2025); • Zelta Matiem Salon (2007 to 2025) • JTC Group of Companies (2007 to 2025); and • Pikimong Pikimong Philippines (2025) (collectively, the "Duterte Businesses")	
	Summary List of Purchases and Sales of the Duterte Businesses	To establish the declared revenues, purchases, operational and other expenses of respondent and her spouse's businesses.
	Corporate ITRs of the Duterte Businesses (2007 to 2025)	To establish the income, profits, and losses from business interests of respondent and her spouse.
	Microsoft Excel file of AMLC CTRs and STRs (2007-2025)	To establish covered and suspicious financial transactions.
	Annexes and supporting documents of AMLC reports (such as, but not limited to, the BPI letter dated March 16 and April 16, 2026, Ultimate Beneficial Owners (UBO) Declaration for Nutri Asia, Inc.	To establish covered and suspicious financial transactions; trace and analyze financial flows and transaction patterns in the bank accounts of respondent and her spouse.

	Banks' Know-Your-Client documents, such as customer information forms and signature cards, Bank Statements, Average Daily Balances, Year-End Balances, Account and Transaction Records in the name of respondent, her spouse, and the Duterte Businesses, as well as all other relevant bank documents	To establish ownership and control of bank accounts, as well as account movements, balances, sources of funds, and destination of funds.
	Work Product of the Financial Forensic Analyst	To establish an expert analysis of respondent and her spouse's actual wealth, financial transactions, business interests and other financial information, vis-a-vis their declared/lawful income/wealth.
	Other documents necessary or relevant to the financial forensic analysis	To establish/facilitate a financial forensic analysis on respondent and her spouse's actual wealth, financial transactions, business interests and other financial information.
	BIR registration, AOI, and By-Laws of the following: • City Hall King Foods Corporation; • Metro City Chow Foods Corporation (except AOI) • Gencorp Industries, Inc.; • 888 Bistro; • CALE88 Foods Corporation; • Mati City Ice Plant and Cold Storage, Inc.; • Geometry Security and Investigation Agency, Inc.;	To prove respondent's corporate interests and ownership positions; registration status of these companies.

	• Cabletow 88 Shipping and Marine Services, Inc.; • Timesquare Bee Foods Corp.; • Great Jolly Times Food Corp.; • Davao New Royal Taipan Corp.; • Davao Emerging Taipans Corp.; • Davao Bounty Times Food Corp.; • SGT Fortune Horse Corp.; • CYKT, Inc.; • 3Kids Trucking Services, Inc.; • Pikimong Pikimong Philippines Corporation; and • JTC Group of Companies	
	DTI Registration of the following: • 888 Bistro • Zelta Matiem Salon	To prove respondent's and her spouse's business interest in these entities.
	GIS of the following: • Madayaw Fisheries Inc. (2022 to 2025); • Amianan Shores, Inc. (2024 to 2025); • Cabletow 88 Shipping and Marine Services, Inc.(2024 to 2025); • Timesquare Bee Foods Corp. (2016 to 2023); • Great Jolly Times Food Corp. (2007 to 2020); • Davao New Royal Taipan Corp. (2007 to 2023); • Davao Emerging Taipans Corp. (2007 to 2012);	To prove respondent's and her spouse's corporate interests, ownership, and positions in the Duterte businesses/companies.

	• Davao Bounty Times Food Corp. (2007 to 2017); • SGT Fortune Horse Corp. (2010 to 2016); • Zelta Matiem Salon (2007 to 2025); • CYKT, Inc. (2010 to 2017); • 3Kids Trucking Services, Inc. (2012 to 2017); • Pikimong Pikimong Philippines Corporation (2025); • JTC Group of Companies (2007 to 2025)	
	AFS of the following (with notes to FS): • City Hall King Chow Foods Corporation (2021 to 2025); • Carpio Lawyers (formerly Carpio & Duterte Lawyers) (2023 to 2025); • 888 Bistro (2021 to 2025) • Madayaw Fisheries Inc. (2022 to 2025); • Mati City Ice Plant and Cold Storage, Inc. (2023 to 2025); • Amianan Shores, Inc. (2024 to 2025); • Cabletow 88 Shipping and Marine Services, Inc. (2024 to 2025); • Davao New Royal Taipan Corp. (2007 to 2023); • Davao Emerging Taipans Corp. (2007 to 2012); • Davao Bounty Times Food Corp. (2007 to 2017);	To prove the declared income/ losses, assets, liabilities, capitalization and other financial information about respondent's and her spouses business interests.

	• SGT Fortune Horse Corp. (2010 to 2016) • 3Kids Inc. (2007 to 2025); • Zelta Matiem Salon (2007 to 2025); • Timesquare Bee Foods Corp. (2016 to 2023); • Great Jolly Times Food Corp. (2007 to 2020); • SGT Fortune Horse Corp. (2010 to 2016); • CYKT, Inc. (2010 to 2017); • 3Kids Trucking Services, Inc. (2012 to 2017); • Pikimong Pikimong Philippines Corporation (2025); • JTC Group of Companies (2007 to 2025)	
	Beneficial Ownership Information and Declarations for the Duterte Businesses	To prove respondent's corporate interests and ownership positions.
	SEC Certification (on the non-registration or non-filing of subpoenaed documents)	To establish, where applicable: (a) the non-registration of businesses linked to respondent and/or her spouse; (b) that certain documents are not on file/cannot be located.
	Other relevant SEC documents on corporations where respondent and/or her spouse has business interests	To establish the income, profits, and losses from business interests of respondent and her spouse; to prove respondent's corporate interests, ownership positions, and participation in the business.
	Report of the PNP FEO	To prove that respondent and her spouse have firearms registered in their names.
	Firearms Valuation Report	To prove the acquisition cost and value of firearms owned by respondent and her spouse.

	Certificate Authorizing Registration (CAR) / transfer documents (for disposed assets/real properties of respondent /her spouse)	To establish the transaction value/financial gain to respondent from the sale of assets.
	CAR and acquisition/ transfer documents (for acquisition or transfer of shares involving business interests/ companies of respondent and her spouse)	To establish the transaction value/financial gain to respondent and her spouse from the acquisition or transfer of shares of stock and changes in the shareholdings pertaining to the business interests of respondent and her spouse.
	Franchise agreements, profit and loss statements, and other relevant records pertaining to respondent's business franchises	To establish respondent's business interest in various franchising enterprises and the income generated by such businesses.
	Work Product, findings, documents examined and issued by former Ombudsman Melchor Carandang, and other relevant records (on the investigation of bank accounts and transactions of respondent and Rodrigo Duterte)	To prove that Melchor Carandang investigated the bank accounts and transactions of respondent and Rodrigo Duterte; to prove the result of such investigation.
	Affidavit of authentication	To authenticate electronic evidence to be presented.
	Documents establishing the qualifications of witnesses	To prove the qualifications/expertise of witnesses.

5.2. The Prosecution reserves the right to present other documentary evidence as the exigencies of trial may require.

ARTICLE III:
BRIBERY AND CORRUPTION WITHIN THE DEPARTMENT OF EDUCATION

I.
THE PROSECUTION'S CLAIMS

1.1. Respondent Vice President Sara Z. Duterte committed bribery, graft and corruption, culpable violation of the Constitution, and betrayed public trust when she authorized or caused the distribution of cash payments to DepEd officials to influence procurement decisions and facilitate circumvention of procurement and financial rules.

II.
PROPOSED STIPULATION OF FACTS

The Prosecution offers the following facts for stipulation for Article III:

2.1. Gloria Jumamil-Mercado was appointed Undersecretary for Human Resources and Organizational Development of the DepEd in August 2022. She was later designated as Head of Procuring Entity in February 2023.

2.2. Ma. Rhunna L. Catalan was the Chief Accountant of the DepEd in 2023.

2.3. At the time of her testimony before the CGGPA, Ms. Catalan had been with the DepEd for almost thirty-six (36) years.

2.4. Resty C. Osias assumed his office as Director IV of the DepEd on January 17, 2023.

2.5. The CGGPA conducted hearings and inquiries in aid of legislation in 2024 concerning, among others, the utilization of confidential funds, liquidation procedures, and procurement activities within DepEd.

2.6. Usec. Mercado appeared and testified under oath before the CGGPA during the hearing conducted on September 25, 2024.

2.7. Dir. Osias appeared and testified under oath before the CGGPA during the hearing conducted on October 17, 2024.

2.8. Ms. Catalan appeared and testified under oath before the CGGPA during the hearing conducted on November 5, 2024.

2.9. SDO Fajarda appeared and testified under oath before the CGGPA during the hearing conducted on November 25, 2024.

III.
ISSUE FOR RESOLUTION

The Prosecution respectfully submits that the issue in relation to Article III be limited to the following:

3.1. Whether respondent committed bribery, graft and corruption, culpable violation of the Constitution, and betrayal of public trust when she gave monetary gifts or payments to DepEd officials by reason of their office, or to induce, facilitate, circumvent, or secure violations of procurement and other related laws, in violation of Republic Act No. 3019 and other applicable laws.

IV.
WITNESSES TO BE PRESENTED

4.1. The Prosecution intends to present the following witnesses to testify on matters relevant and material to the Articles of Impeachment and for the specified purposes:

	Witness	Purpose of Testimony
1	**Gloria Jumamil-Mercado**	To prove that she was the former DepEd Undersecretary for Human Resources and Organizational Development/HOPE; testified she repeatedly received cash envelopes (₱50,000.00) from respondent through Asec. Fajarda; she witnessed attempts to influence procurement/bidding; she was later asked to resign after refusing irregular arrangements.
2	**Resty Osias**	To prove that he is the DepEd Director in January 2023; he received cash envelopes (₱12,000.00 to ₱15,000.00)

		from respondent through Asec. Fajarda; to corroborate testimony on efforts to influence the bidding process
3	**Wilma Ecalnir / Accountant from DepEd**	To prove receipt of cash envelopes from respondent through Asec. Fajarda; identify confidential fund liquidation reports; establish that cash distributions are linked to confidential funds processing and liquidation.
4	**Edward D. Fajarda**	To prove that he is the former DepEd SDO; allegedly acted on respondent's instructions to collect bank details of DepEd officials and facilitate money transfers; to prove that he has direct knowledge of recipients, amounts, and circumstances of transfers.
	RESERVE WITNESS	
5	**DepEd Representatives** (at least eight)	To prove the receipt of requests from for bank account details despite DepEd already having official payroll accounts; to prove receipt of monetary distributions during the period confidential funds were disbursed; to establish a pattern of fund transfers.

4.2. The Prosecution reserves the right to present additional or substitute witnesses as the circumstances may warrant.

V.
DOCUMENTARY EVIDENCE

5.1. The Prosecution intends to present the following documentary evidence to prove the material allegations of the Articles of Impeachment, the contents of the documents, and for the specified purposes:

	Document	Purpose
	Affidavit dated September 25, 2024 executed by Usec. Mercado	To establish Usec.Mercado's testimony that she received cash-filled envelopes from respondent through Asec. Fajarda, and supports claims of cash distribution

		to DepEd officials during the relevant confidential fund period.
	Nine (9) envelopes marked "HOPE" and a pouch	To prove that envelopes containing cash were given to Usec. Mercado; to corroborate her account of cash distribution and its manner, source, and circumstances.
	Screenshots of text messages (SDO Fajarda to Regional Directors)	To prove the requests for bank account details from Regional Directors; to establish the method used to facilitate monetary transfers and support witness testimonies on irregular disbursements.
	Screenshots of text messages (SDO Fajarda to Region VII School Division Superintendents)	To prove similar requests for bank account details from school divisior superintendents; used to demonstrate a broader pattern of arranging monetary transfers.
	DepEd Liquidation Report (First Quarter, 2023)	To prove that upon the request of Asec. Fajarda, Ms. Catalan signed and certified the report as complete and proper without reviewing supporting documents.
	DepEd Liquidation Report (Second Quarter, 2023)	To prove that upon the request of Asec. Fajarda, Ms. Catalan certified the report as complete and proper without reviewing supporting documents.
	DepEd Liquidation Report (Third Quarter, 2023)	To establish the continued practice of Catalan certifying liquidation reports as complete and proper without examining supporting documents, under the instruction oı influence of Asec. Fajarda.
	Affidavit of authentication	To authenticate electronic evidence to be presented.
	Documents establishing qualifications of witnesses	To prove qualifications/expertise oi witnesses.

5.2. The Prosecution reserves the right to present other documentary evidence as the exigencies of the trial may require.

ARTICLE IV:
ASSASSINATION PLOT, GRAVE THREATS, AND INCITING SEDITION AGAINST THE GOVERNMENT

I.
THE PROSECUTION'S CLAIMS

1.1. Respondent Vice President Sara Z. Duterte committed culpable violation of the Constitution, high crimes, and betrayed public trust by:

(1) contracting for the assassination of the President, First Lady, and former Speaker of the House;

(2) by making grave threats; and

(3) actively inciting to sedition against the Republic.

II.
PROPOSED STIPULATION OF FACTS

The Prosecution offers the following facts for stipulation for Article IV:

2.1. On November 23, 2024, respondent declared that she contracted someone to kill President Marcos, First Lady Liza Araneta, and former Speaker Martin Romualdez.

2.2. She did not deny contracting someone to kill President Marcos, First Lady Liza Araneta, and former Speaker Martin Romualdez, and in fact, admitted it on November 26, 2024.

2.3. On November 20 to 23, 2024, while respondent was in the House of Representatives complex, she was treated with respect, courtesy, and as a VVIP.

2.4. The NBI was directed by the Department of Justice ("DOJ") to investigate the threats made by respondent.

2.5. After respondent's declaration of contracting someone to kill the President Marcos, First Lady Liza Araneta, and former House Speaker Martin Romualdez, the security of the foregoing persons was heightened.

2.6. Respondent's threat and declaration of contracting someone to kill the President Marcos, First Lady Liza Araneta, and former House Speaker Martin Romualdez was treated as an active threat by various government agencies.

2.7. On January 28, 2024, respondent's brother publicly reminded the President of what happened to the "Romanovs," "Musollini," and what happened to the Marcos family in 1986.

2.8. On June 19, 2024, the respondent resigned as the Secretary of the Department of Education

2.9. On July 11, 2024, respondent stated that she would not attend the SONA, and instead, publicly declared herself as the "designated survivor."

2.10. On October 18, 2024, during a press conference, respondent stated, among others, that:

(a) "Gusto ko tanggalin yung ulo niya"

(b) "I imagine myself cutting his head.";

(c) "So noon, narealize ko toxic na di ba, ganyan na 'yung imagination mo, sinasakal mo na yung tao. Then I said this is over.";

(d) "Hindi marunong maging Presidente and nakaupo, kasalanan ko ba iyon.";

(e) "Hindi ko alam. Isang beses sinabihan ko talaga si Sen. Imee (Marcos), 'pag 'di tumigil, huhukayin ko ang tatay ninyo at itatapon ko sya sa West Philippine Sea"; and

(f) "Kung president niyo siya okay lang. Ako hanggang Vice President lang ako, hanggang number 2 lang itong bansa na ito, wala itong number 1 para sa akin."

2.11. On April 12, 2026, respondent's brother, Mayor Sebastian Duterte, stated that they only need one head — that is, the head of the President.

III.
ISSUE FOR RESOLUTION

The Prosecution respectfully submits that the issue in relation to Article IV be limited to the following:

3.1. Whether respondent committed culpable violation of the constitution, high crimes, and betrayed public trust by contracting for the assassination of the President, the First Lady, and the former Speaker of the House, by making grave threats, and by actively inciting sedition against the Republic.

IV.
WITNESSES TO BE PRESENTED

4.1. The Prosecution intends to present the following witnesses to testify on matters relevant and material to the Articles of Impeachment and for the specified purposes:

	Witness	Purpose of Testimony
1	**Belinda Bello**	To prove that she is the House Legislative Security Bureau Executive Director; to testify on the November 23, 2024 HOR incident involving respondent and Atty. Zuleika Lopez; no intimidation by security personnel; respondent violated protocols (locking herself in a room, overstaying in detention area); to authenticate related records and videos.
2	**Jeremy Lotoc**	To prove that he testified on respondent's November 23, 2024 public statement involving threats against top officials; to prove the NBI investigation, inter-agency response, and filing of complaints for Inciting to Sedition and Grave Threats against respondent.
3	**John Mark Calilung**	To prove that he is the NBI cybercrime agent who investigated and authenticated the livestream/video of respondent's statements; that he participated in digital forensics and open-source investigation.

4	**Atty. Melvin Matibag**	To prove that he is the NBI Director; to confirm the NBI's investigation into respondent's statements, to prove the filing of related complaints and creation of a task force on threats against the President; to authenticate official documents and findings.
5	**Philippine National Police Firearms and Explosives Office Representative**	To prove that respondent owns several firearms, including high-powered ones; to prove respondent's capacity and capability to follow through on her threat
6	**Mikhail Flores**	To prove that the witness was present during the November 23, 2024 online press briefing heard respondent's threats against the President, First Lady, and former House Speaker.
7	**Bonz Magsambol**	To prove that the witness was present during the November 23, 2024 online press briefing heard respondent's threats against the President, First Lady, and former House Speaker.
8	**Sheriff Abe Andres**	To prove that respondent has the tendency to inflict violence.
	RESERVE WITNESS	
9	**Family member of a victim of threats**	To prove the effect, gravity, and seriousness of threats.
10	**Psychiatrist**	To prove respondent's state of mind and nature of violence; to prove respondent's capacity and capability to follow through on her threat

4.2. The Prosecution reserves the right to present additional or substitute witnesses as the circumstances may warrant.

V.
DOCUMENTARY EVIDENCE

5.1. The Prosecution intends to present the following documentary evidence to prove the material allegations of the Articles of Impeachment, the contents of the documents, and for the specified purposes:

	Document	Purpose
	Video by Ryan Labug saved in a USB flashdrive	To prove that Belinda Bello attempted to serve of a Transfer Order on Atty. Zuleika Lopez; Atty. Lopez refused to accept the copy of the Transfer Order; respondent was treated with courtesy while in the premises of the HOR; the surrounding circumstances before respondent uttered the subject grave threats.
	Office of the Sergeant-at-Arms (OSAA) Report dated November 22, 2024	To prove that respondent's presence and security detail in the HOR disrupted HOR operations, strained security resources, and created security concerns.
	Affidavit of Investigation dated February 10, 2025 (signed by SA Jeremy C. Lotoc, SRA Ria Vanessa DS. Asuncion, SRA Van Homer M. Angluben, and Agent John Mark Calilung)	To establish the NBI's basis in charging respondent with three (3) counts of Grave Threats and Inciting to Sedition after investigation of the November 23, 2024 incident
	***Subpoena Ad Testificandum* dated November 25, 2024**	To prove that the NBI invited respondent to appear during its investigation.
	Letter dated December 2, 2024	To establish NBI investigation process and procedural records.
	***Subpoena Ad Testificandum* dated December 2, 2024**	To establish the formal investigative process and respondent's non-compliance.

	Preservation Request to META dated November 28, 2024	To prove the NBI's request to preserve online video evidence of respondent's press conference.
	Email dated November 28, 2024	To prove the preservation/ authentication of digital evidence in relation to the subject video.
	November 23, 2024 Video stored in a digital video disc attached as Annex "E" of the Affidavit of Authentication of Digital Evidence dated January 30, 2025 (online press briefing of respondent threatening the President, First Lady, and former House Speaker)	To prove respondent's statements threatening the President, First Lady, and Speaker
	October 18, 2024 Video stored in a USB flashdrive attached as Annex "H" to the Affidavit of Authentication of Digital Evidence dated January 30, 2025 (press conference where respondent said she will unearth the remains of former President Marcos Sr. and throw the same to the West Philippine Sea)	To prove prior statements by respondent; to establish pattern of hostile or malicious remarks.
	Screenshot of the President's Statement ("Message by President Marcos Jr.")	To prove the reaction of the President following alleged threats made by respondent.
	November 25, 2024 Video stored in a digital video disc attached as Annex "K" to the Affidavit of Authentication of Digital Evidence dated January 30, 2025	To prove responses from national officials and agencies treating the threats seriously; to support classification as "active threat."

	(the President making his statement on respondent's threats)	
	Screenshot of the Presidential Communications Office deeming the statements of respondent as an "active threat"	
	November 25, 2024 Video stored in a digital video disc attached as Annex "M" to the Affidavit of Authentication of Digital Evidence dated January 30, 2025 (Speech of former Speaker on the threats made by respondent)	To prove former Speaker Romualdez's reaction and confirmation that threats were taken seriously.
	Screenshot of the AFP's Statement on Military Professionalism and National Unity	To prove the Armed Forces' response emphasizing professionalism and reaction to alleged threats.
	Screenshot of the PNP Statement on its treatment of threats to the President and all public officials	To prove the PNP's acknowledgment/response to the subject threats.
	Screenshot of the NSC Statement on its treatment of threats against the President.	To prove the National Security Council's response treating the threats against President Marcos as a security concern.
	Affidavit of Authentication of Digital Evidence of Agent John Mark Calilung dated January 30, 2025	To authenticate digital/video evidence used in the investigation and impeachment case.
	Affidavit of Agent John Mark Calilung dated February 10, 2025 (Reyes & Koon)	To prove that respondents made threats against the President, the First Lady, and the former House Speaker; to provide corroboration.

	Signed Minutes (Reyes) (Minutes of Agent Calilung's interview with Dempsey Cyden Reyes, who was assisted by Atty. Jethro Laurenz A. Koon)	To authenticate testimonies and events in relation to the subject threats.
	Affidavit of Agent John Mark Calilung dated February 10, 2025 (Magzambol)	To prove that respondent made threats against the President, the First Lady, and the former House Speaker; to corroborate earlier affidavits.
	Signed Minutes (Magzambol) (Minutes of Agent Calilung's interview with Bonz Magzambol, who was assisted by Atty. De Castro)	To authenticate testimonies and events in relation to the subject threats.
	June 19, 2024 Video stored in a USB flashdrive marked as Annex "C" of Affidavit of Authentication of Digital Evidence dated April 30, 2026 (Video of respondent resignation as DepEd Secretary)	To prove respondent's public announcement of her resignation as DepEd Secretary on June 19, 2024.
	July 11, 2024 Video stored in a USB flashdrive marked as Annex "C" of Affidavit of Authentication of Digital Evidence dated April 30, 2026 (Video of respondent declaring she will not attend the 2024 State of the Nation Address and calling herself the "designated survivor'")	To prove respondent's public declaration that she will not attend the State of the Nation Address and that she referred to herself as the "designated survivor").

	Affidavit of Authentication of Digital Evidence of NBI Agent John Mark Calilung dated April 30, 2026	To authenticate digital/video evidence used in the investigation and impeachment case.
	November 26, 2024 Video stored in a USB flashdrive marked as Annex "C" of Affidavit of Authentication of Digital Evidence dated April 27, 2026 (Respondent confirmed that she contracted an assassin to kill the President, First Lady, and former Speaker)	To prove that respondent confirmed she contracted an assassin to kill the President, First Lady, and Speaker.
	Affidavit of Authentication of Digital Evidence Agent John Mark Calilung dated April 27, 2026	To authenticate digital/video evidence used in the investigation and impeachment case.
	Affidavit of the Collection, Preservation and Authentication of Digital Evidence Agent John Mark Calilung dated June 11, 2026	To authenticate digital evidence supporting admissibility and chain of custody.
	National Bureau of Investigation (NBI) Administrative Order No. 11	To establish that the NBI took the threats made against the President seriously and conducted an investigation on the matter.
	April 12, 2026 Video stored in a USB flashdrive marked as Annex "A" of Affidavit of PwedeAuthentication of Digital Evidence dated April 30, 2026 (Mayor Sebastian Duterte stating that they only need the head of President Marcos)	To prove that respondent's brother called for the "head of the President"; to support claims of hostile intent environment.

	Affidavit of Authentication of Digital Evidence of Agent Edgar M. Apolonio dated May 4, 2026	To authenticate video evidence involving respondent's brother and related statements for evidentiary purposes.
	RESERVE EVIDENCE	
	Records of the respondent's registered firearms with the PNP	To prove that respondent owns several firearms, including high-powered ones, and that she has the capacity and capability to follow through on her threat.
	Curriculum Vitae of the Psychiatrist	To prove the credentials and expertise of the witness.
	Psychiatric Report	To prove respondent's state of mind and nature of violence; to prove respondent's capacity and capability to follow through on her threat.
	Affidavit of authentication	To authenticate electronic evidence to be presented.
	Documents establishing the qualifications of witnesses	To prove the qualifications/ expertise of witnesses.

5.2. The Prosecution reserves the right to present other documentary evidence as the exigencies of trial may require.

RESPECTFULLY SUBMITTED.

Quezon City for Pasay City, June 15, 2026.

THE PUBLIC PROSECUTORS
FOR THE IMPEACHMENT CASE AGAINST
VICE PRESIDENT SARA ZIMMERMAN DUTERTE
House of Representatives
Constitution Hills
Quezon City, Philippines 1126

By:

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